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Proposed Attorney for the Official Committee of  
Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**RIVERSIDE DIVISION**

In re:  
OKAYSOU CORPORATION,  
Debtor and Debtor in Possession.

Case No. 6:23-bk-11535-MH  
Chapter 11

**NOTICE OF HEARING ON  
APPLICATION FOR ORDER  
AUTHORIZING THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS TO EMPLOY  
SHEMANOLAW AS BANKRUPTCY  
COUNSEL; DECLARATION OF DAVID B.  
SHEMANO**

Hearing:

Date: October 3, 2023  
Time: 2:00 p.m.  
Place: Courtroom 301  
3420 Twelfth Street  
Riverside, CA 92501

1           **PLEASE TAKE NOTICE** that on August 21, 2023, the Official Committee of  
2 Unsecured Creditors (the “Committee”) appointed in the above-captioned case for Okaysou  
3 Corporation (the “Debtor”), filed and served its notice of application and application for an order  
4 authorizing the Committee to employ ShemanoLaw (the “Firm”) as bankruptcy counsel (the  
5 “Application”) [Doc 71]. The Application provides that pursuant to LBR 2014-1(b)(3), any  
6 response to the Application and request for a hearing, in the form required by LBR 9013-1(f)(1),  
7 must be filed with the Court and served on the Firm and the United States Trustee not later than  
8 fourteen (14) days from the date of the service of the Application.

9           **PLEASE TAKE FURTHER NOTICE** that the Debtor filed an opposition to the  
10 Application and the United States filed a limited objection to the Application. The attached  
11 Declaration of David Shemano is intended to address the issues identified in the opposition and  
12 limited objection.

13           **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will conduct a hearing  
14 on the Application on October 3, 2023, at 2:00 p.m., in Courtroom 301, located at 3420 Twelfth  
15 Street Riverside, CA 92501.

16 Dated: September 13, 2023

SHEMANOLAW

18 By: /s/ David B. Shemano  
19 David B. Shemano  
20 Proposed Attorney for the Official  
21 Committee of Unsecured Creditors  
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**DECLARATION OF DAVID B. SHEMANO**

I, David B. Shemano, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and duly admitted to practice before the United States Bankruptcy Court for the Central District of California, and the owner of ShemanoLaw (the “Firm”). Each of the facts contained in this declaration is based upon my personal knowledge and, if called as a witness to do so, I could competently testify thereto.

2. The Firm has been requested to serve as bankruptcy counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Okaysou Corporation (the “Debtor”) in the Debtor’s bankruptcy case, on the terms described in the Application filed on August 21, 2023. There is no separate engagement letter between the Firm and the Committee. All provisions of the engagement are set forth in the Application.

3. Paragraph 5 of my Declaration in support of the Application states that the Firm and I do not hold or represent an interest adverse to the Debtor or the estate and do not have any connection with the Debtor, the creditors, or any other party in interest in this case, or their respective attorneys or accountants, except as otherwise stated in the Declaration. Paragraph 6 of the Declaration sets various categories of hypothetical relationships that I do not believe constitute an actual or potential conflict. I am unaware of any connection or relationship that must be disclosed pursuant to Rule 2014. I can affirmatively represent that I have no prior connection or relationship with the Etekcity/Arovast creditors, their counsel R. Joseph Trojan, or any other creditor in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of September 2023, at Los Angeles, California.

/s/ David B. Shemano  
David B. Shemano

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is

SHEMANOLAW  
1801 Century Park East, Suite 2500  
Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled **NOTICE OF HEARING ON APPLICATION FOR ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY SHEMANOLAW AS BANKRUPTCY COUNSEL; DECLARATION OF DAVID B. SHEMANO** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On September 13, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Abram Feuerstein abram.s.feuerstein@usdoj.gov
- Michael J Gearin michael.gearin@klgates.com
- Everett L Green everett.l.green@usdoj.gov
- Vahe Khojayan vkhojayan@yklaw.us
- Yi Hui Lee mlee@yklaw.us
- Cameron C Ridley Cameron.Ridley@usdoj.gov
- Allan D Sarver ADS@asarverlaw.com
- David B Shemano dshemano@shemanolaw.com
- Raymond Trojan trojan@trojanlawoffices.com, shibata@trojanlawoffices.com
- United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

**2. SERVED BY UNITED STATES MAIL:**

On September 13, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Okaysou Corporation  
603 S. Miliken Ave, Ste G  
Ontario, CA 91761

United States Bankruptcy Court  
Central District of California  
3420 Twelfth Street, Suite 325  
Riverside, CA 92501-3819

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 13, 2023

David B. Shemano

/s David B. Shemano

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.